

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24-cr-20051-JEM

**UNITED STATES OF AMERICA**

**Plaintiff,**

**vs.**

**ALFRED LENORIS DAVIS,**

**Defendant.**

\_\_\_\_\_ /

**REPLY TO UNITED STATES' RESPONSE IN OPPOSITION TO THE DEFENDANT'S  
MOTION IN LIMINE**

The Defendant, Alfred Lenoris Davis, by and through undersigned counsel, respectfully files this Reply to United States' Response to the Defendant's Motion in Limine [DE 30] and states the following:

1. The Court's pretrial order directed the parties to file Motions in Limine no later than a week prior to the calendar call, which made the Motion due by April 23, 2024.
2. The Government emailed the undersigned on Friday, April 19, 2024, asking whether the undersigned would stipulate to the fact that the defendant was previously convicted of a felony. The Government indicated they would be filing a notice of intent to introduce Defendant's previous conviction and notice to introduce testimony that the Defendant previously lived at the same building under the same alias.
3. The undersigned emailed the Government on Monday, April 22, 2024, indicating that we would not agree to the proposed stipulation and opposed it.
4. On April 23, 2024, seeing no Notice of Intent to Introduce Evidence under FRE 404(b) was filed by the Government, the undersigned filed a Motion in Limine to exclude the evidence proposed by the Government in their email.

5. Later on in the day, the Government filed their Notice of Intent to Introduce Evidence as Inextricably Intertwined or Under Rule 404(B) [DE 27].
6. The undersigned was unable to file a more detailed Motion in Limine regarding the previous convictions and previous bad acts without being properly noticed by the Government.
7. The undersigned has filed a Response to the Government's 404(B) Notice contemporaneously with this Reply [DE 31].

WHEREFORE, the Defense asks that the Court considers the Defendant's Response to the Government's Notice of Intent to Introduce Evidence [DE 31] when ruling on Defendant's Motion In Limine.

**CERTIFICATE OF SERVICE**

I HEREBY certify that on April 27, 2024, undersigned counsel electronically filed foregoing document with the Clerk of Courts using CM/ECF which will send notification of such filing to all counsel of record.

Respectfully submitted,

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*/s/Zeljka Bozanic*

By: \_\_\_\_\_  
Zeljka Bozanic  
Florida Bar No. 23707